DOMINION ENERGY SOUTH CAROLINA, INC. SOUTH CAROLINA COASTAL CONSERVATION LEAGUE AND SOUTHERN ALLIANCE FOR CLEAN ENERGY SECOND AND CONTINUING REQUEST FOR PRODUCTION OF BOOKS, RECORDS AND OTHER INFORMATION DOCKET NO. 2022-2-E

REQUEST 2-7:

Order No. 2021-569, at Finding 15, found that "There are temporal and seasonal variations in energy costs for electrical utilities that are not currently reflected in the legacy valuation framework for DER."

- a. How has DESC modified its avoided energy costs to reflect the "temporal and seasonal variations in energy costs"?
- b. How has DESC reflected the conclusion on page 36 of Order No. 2021-569 that "it is appropriate to determine a per kWh average price [for avoided energy costs] based on daylight hours where solar is expected to operate"?

RESPONSE 2-7:

DESC filed its T&D Avoided Cost Plan in Docket No. 2019-182-E on November 17, 2021, which sets forth an implementation schedule (in Exhibit A) to carry out the directives in Commission Order No. 2021-569. DESC is carrying out its T&D Avoided Cost Plan as filed, but it does not yet have the additional data necessary to reflect the temporal and seasonal variation in energy costs or to determine a per kWh average price for avoided energy costs based on daylight hours where solar is expected to operate. Accordingly, DESC is not in possession of the information that this request seeks.